

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

SHANNI SNYDER,)	
)	Civil Action No. 2:24-cv-00478-NBF
Appellant,)	
)	
v.)	
)	
CHRISTINE BIROS,)	
)	
Appellee)	

**CONSENT MOTION OF APPELLEE CHRISTINE BIROS TO EXTEND
DEADLINE FOR FILING OF RESPONSE BRIEF**

AND NOW COMES the Appellee, Christine Biros ('Biros'), and with consent of the Appellant, Shanni Snyder, respectfully requests that this Court enlarge the time period in which she can file her brief in this proceeding and re-set the filing deadline to Friday, August 2, 2024. In support of that request, Biros states as follows:

1. Biros requests this extension because of the press of work in other matters, including without limitation the two other matters pending before this Court and the U.S. Court of Appeals for the Third Circuit, all arising from the *In re U Lock Inc.* bankruptcy case, in which Snyder and her brother are appellants and in which Biros faces briefing deadlines within the next two weeks.

2. Biros does not make this motion for purposes of delay, and she anticipates that she will be able to file her brief with this Court by the August 2, 2024, deadline she is requesting.

3. Biros has not requested any prior extensions of time and has not objected to Shanni Snyder's previous request for the extension of the deadline to file her appellate brief.

4. Appellant Shanni Snyder has, through counsel, consented to the relief that Biros seeks in this motion.

WHEREFORE, Biros respectfully requests that this court grant this motion and extend the period in which she is to file her Appellee's brief in this matter to August 2, 2024.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

Dated: June 25, 2024

By: Stuart C. Gaul, Jr.

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Counsel for Appellee Christine Biros

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the within
CONSENT MOTION OF APPELLEE CHRISTINE BIROS TO EXTEND
DEADLINE FOR FILING OF RESPONSE BRIEF was served this 25th day of June,
2024, via the Court's CM/ECF notification system on all counsel of record and
unrepresented parties.

Stuart C. Gaul, Jr.